



UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

GILLMAN CAPONE, LLC
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Attorney for Debtors- In-Possession
MARC C. CAPONE MC4795

Order Filed on May 12, 2025
by Clerk
U.S. Bankruptcy Court
District of New Jersey

In Re:

Case No.: **24-16283**

Jean-Paul and Lisa A. Romes

Judge: **John K. Sherwood**

Chapter: **11**

**CONSENT ORDER RESOLVING OBJECTION TO DISCLOSURE STATEMENT AND
PLAN FILED BY WATERVIEW MARKETPLACE OWNER LLC**

The relief set forth on the following page, numbered two (2) through three (3), is hereby granted.

DATED: May 12, 2025


Honorable John K. Sherwood
United States Bankruptcy Court

WHEREAS, on June 21, 2024, Jean-Paul and Lisa Romes (the “Debtors”) filed a voluntary petition for relief under Chapter 11, Subchapter V of the United States Bankruptcy Code; and

WHEREAS, Waterview Marketplace Owner LLC (the “Creditor”) filed a timely proof of claim in the case, which was not objected to or disputed by the Debtors; and

WHEREAS, the Creditor filed an Objection to Disclosure Statement and Plan filed by the Debtors’ [Docket No. 37]; and

WHEREAS, the parties have conferred and desire to resolve the Objection by stipulation and consent, without the need for further litigation; and

WHEREAS, the Debtors have filed an Amended Disclosure Statement and Plan of Reorganization [Docket No. 56] and Modified Chapter 11 Plan in support [Docket No. 59], which reflects the agreed-upon changes, including:

1. Increasing the monthly Plan payments to \$9,500.00 beginning in month 19 and continuing through month 60;
2. Increasing the dividend payable to the Class of General Unsecured Creditors by an aggregate amount of \$31,000.00;
3. Revising the total amount of allowed general unsecured claims in accordance with the proofs of claim filed and deemed allowed under 11 U.S.C. § 502(a), which reduces the overall distribution base; and
4. Agreeing that the Debtors will not object to or seek to modify the proof of claim filed by the Objecting Creditor (Claim No. 22), which shall remain allowed in full as filed.

NOW, THEREFORE, it is hereby **STIPULATED AND AGREED** by and between the undersigned parties and **ORDERED** by this Court that:

1. The Debtors shall increase monthly payments under the Plan to \$9,500.00 beginning in month 19 through month 60, which will result in an increased dividend to general unsecured creditors totaling \$31,000.00.
2. The Debtors shall not object to the proof of claim filed by Waterview Marketplace Owner LLC (Claim No. 22), which shall be deemed allowed as filed.
3. Waterview Marketplace Owner LLC's Objection to Disclosure Statement and Plan [Docket No. 37] shall be deemed withdrawn upon entry of this Consent Order.
4. The terms of this Consent Order shall be incorporated into the Debtors' confirmed Plan of Reorganization by reference.

The parties, through the undersigned counsel, consent to the form and entry of this Order:

GILLMAN CAPONE, LLC
Attorneys for Debtor

TRAURIG LAW LLC
Attorney for Waterview Marketplace Owner
LLC

By: /s/ Marc C. Capone
Marc C. Capone, Esq.

By: /s/ Jeffrey Traurig
Jeffrey Traurig, Esq.

Dated: May 9, 2025

Dated: May 9, 2025

In re:
Jean-Paul Romes
Lisa A. Romes
Debtors

Case No. 24-16283-JKS
Chapter 11

District/off: 0312-2
Date Rcvd: May 12, 2025

User: admin
Form ID: pdf903

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Total Noticed: 2

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on May 14, 2025:

Recip ID	Recipient Name and Address
db/jdb	+ Jean-Paul Romes, Lisa A. Romes, 5125 Glenbrook Rd, Stroudsburg, PA 18360-6793
aty	+ Marc C. Capone, Gillman, Bruton, and Capone, LLC, 60 Highway 71, Unit 2, Spring Lake Heights, NJ 07762-1878

TOTAL: 2

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: May 14, 2025

Signature: _____

/s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on May 12, 2025 at the address(es) listed below:

Name	Email Address
Denise E. Carlon	on behalf of Creditor Flagstar Bank NA dcarlon@kmllawgroup.com, bkgroup@kmllawgroup.com
Fran B. Steele	on behalf of U.S. Trustee U.S. Trustee Fran.B.Steele@usdoj.gov
Geoffrey Edward Lynott	on behalf of Creditor M&T Bank glynott@mccarter.com lrestivo@mccarter.com
Jeffrey M. Traurig	on behalf of Creditor Waterview Marketplace Owner LLC jtraurig@trauriglaw.com
Joseph H. Lemkin	on behalf of Creditor Bridgewater Regency LLC jlemkin@stark-stark.com

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Date Rcvd: May 12, 2025

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Total Noticed: 2

Joseph Ryan McCarthy

on behalf of Creditor Bridgewater Regency LLC jmccarthy@stark-stark.com

Marc C Capone

on behalf of Joint Debtor Lisa A. Romes ecf@gillmancapone.com
GillmanBrutonCaponeLLC@jubileebk.net,e4eaf5f23@maildrop.clio.com;mcapone@ecf.courtdrive.com;jgillman@ecf.courtdrive.com

Marc C Capone

on behalf of Debtor Jean-Paul Romes ecf@gillmancapone.com
GillmanBrutonCaponeLLC@jubileebk.net,e4eaf5f23@maildrop.clio.com;mcapone@ecf.courtdrive.com;jgillman@ecf.courtdrive.com

Thomas S. Onder

on behalf of Creditor Bridgewater Regency LLC tonder@stark-stark.com

U.S. Trustee

USTPRRegion03.NE.EDF@usdoj.gov

TOTAL: 10